

TROY LAW, PLLC

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August 9, 2018

Via ECF

Hon. Steven M. Gold, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Status Regarding Plaintiff's Proposed Second Amended Complaint
1:17-cv-07601-ARR-SMG Zeng v. *The Parc Hotel LLC, et al*

Dear Honorable Judge Gold:

This office represents the plaintiff in the above-captioned matter. We write respectfully to report to your Honor regarding the status of Plaintiff's proposed Second Amended Complaint.

On July 24, Plaintiff sent previous defense counsel Mr. Benjamin Stockman the proposed Second Amended Complaint, pursuant to your Honor's July 10th order. On July 24, Mr. Stockman wrote to your Honor stating he believes that Plaintiff's Second Amended Complaint contained confusing language in paragraphs 31-37; and on July 25, your Honor directed Plaintiff to submit a letter on or before August 3, explaining why Plaintiff's Second Amended Complaint is good to file.

On July 27, despite believing the language was clear in the Second Amended Complaint, Plaintiff accommodated Mr. Stockman's concerns, and modified the language in paragraphs 31-38. On the same day, Plaintiff sent the modified version to Mr. Stockman. Plaintiff was hoping to address the issues among parties first, and then report to the Court. However, Mr. Stockman never responded to Plaintiff, and Plaintiff failed to report to the Court by August 3. Plaintiff's counsel sincerely apologizes for missing the Court's deadline.

Recently, Plaintiff's counsel learned that Mr. Stockman may no longer work on the case. Plaintiff's counsel is now in discussion with the Defendants' new representing firm on the issues with the proposed Second Amended Complaint. Plaintiff believes the language in paragraphs 31-38 is clear and not confusing at all. Plaintiff's counsel again, apologizes for not submitting to your Honor on time, and respectfully request your Honor allow more time for parties to work out on the issues with the proposed Second Amended Complaint.

We thank the Court for its attention to and consideration of this matter.

Respectfully submitted,
TROY LAW, PLLC

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/s/ John Troy

John Troy

Attorney for Plaintiffs

cc: via ECF

all counsel of record